

EXHIBIT 3

Page 1

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE NORTHERN DISTRICT OF OHIO
3 EASTERN DIVISION

4 IN RE: NATIONAL PRESCRIPTION MDL No. 2804
5 OPIATE LITIGATION Case No. 17-md-2804

6 This document relates to: Judge Dan
7 Aaron Polster

8 The County of Cuyahoga v. Purdue
9 Pharma, L.P., et al.

10 Case No. 17-OP-45005

11 City of Cleveland, Ohio vs. Purdue
12 Pharma, L.P., et al.

13 Case No. 18-OP-45132

14 The County of Summit, Ohio,
15 et al. v. Purdue Pharma, L.P.,
16 et al.

17 Case No. 18-OP-45090

18 Videotaped Deposition of Joseph Rannazzisi
19 Washington, D.C.

20 April 26, 2019

21 8:37 a.m.

22

23

24 Reported by: Bonnie L. Russo

25 Job No. 3301876

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1 that you would get paid for your work with the
2 Fields firm?

3 MR. UTTER: You can answer that.

4 THE WITNESS: Yes.

5 BY MR. EPPICH:

6 Q. Did you sign a contract with them?

7 A. Yes.

8 Q. How much are you paid per hour?

9 MR. UTTER: You can answer.

10 THE WITNESS: \$500 an hour.

11 BY MR. EPPICH:

12 Q. And how many hours have you billed
13 to date?

14 MR. UTTER: That I would instruct
15 you not to answer.

16 THE WITNESS: I don't --

17 MR. UTTER: That I would instruct
18 you not to answer.

19 SPECIAL MASTER COHEN: No, you can
20 answer that question.

21 MR. UTTER: Go ahead.

22 THE WITNESS: I don't know.

23 BY MR. EPPICH:

24 Q. Do you know how much money you
25 received from the Fields firm to date?

1 MR. UTTER: Go ahead.

2 THE WITNESS: I don't know.

3 BY MR. EPPICH:

4 Q. Is it more than \$10,000?

5 A. Yes.

6 Q. More than \$50,000?

7 A. Yes.

8 Q. More than \$100,000?

9 A. I would say yes.

10 Q. More than a quarter million dollars?

11 A. No.

12 Q. Are you billing the Fields firm for
13 your testimony here today?

14 A. No.

15 Q. Are you billing the Fields firm for
16 your preparation sessions for this deposition
17 today?

18 A. No.

19 Q. Are you being compensated by any
20 lawyer or entity for your testimony here today
21 or the preparations for your testimony here
22 today?

23 A. Well, I was under the impression I
24 got a witness fee from the defendants.

25 Q. Other than that?

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1 that question for you. You did not ask him,
2 what did you tell registrants about what was an
3 unusual size which is what would be within No.
4 3.

5 BY MS. MAINIGI:

6 Q. Well, let's make sure we do both,
7 Mr. Rannazzisi.

8 You gave me your definition of
9 unusual size, correct?

10 A. Yes.

11 Q. And I think you also told me earlier
12 that you don't recall yourself elaborating for
13 any registrant as you did in this deposition,
14 what unusual size meant to you, correct?

15 MS. SINGER: Objection. Misstates
16 prior testimony.

17 MR. BENNETT: I join that objection.

18 MR. UTTER: Same objection.

19 Go ahead.

20 THE WITNESS: I don't -- I haven't
21 had the opportunity -- well, I have never told
22 a registrant what their responsibility is as
23 far as what my definition of a suspicious order
24 is. That would have come from my staff or the
25 liaison policy section or the pharmaceutical

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1 investigation section or E-commerce, you know,
2 if they were still there, but it wouldn't have
3 come from my office directly.

4 BY MS. MAINIGI:

5 Q. And were you ever aware of any
6 definition that could have been offered by one
7 of your staff to registrants?

8 A. I wasn't aware of what -- they were
9 trained, they are trained to follow what the
10 regulation says, and I'm sure they can give
11 examples just like I just did, but no, I am not
12 aware of any specific guidance that they gave.
13 I mean, we had companies calling in for all
14 different types of issues, not just related to
15 suspicious orders. They were trained to give
16 guidance based on the regs and the Controlled
17 Substances Act.

18 Q. Companies would call in, though, I
19 take it, to ask for further elaboration on the
20 definition of a suspicious order, correct?

21 MS. SINGER: Objection. Foundation.

22 MR. BENNETT: Same objection.

23 THE WITNESS: Companies have called
24 in to liaison and policy and also to -- back
25 when E-commerce was E-commerce and other

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1 Q. So you, yourself, have never even
2 inspected a suspicious order monitoring system,
3 fair?

4 MR. BENNETT: Objection. Misstates
5 testimony. Objection. Scope.

6 THE WITNESS: I have never gone on
7 site and reviewed a suspicious order monitoring
8 system, no.

9 BY MS. MAINIGI:

10 Q. Have you ever viewed one on paper?

11 MR. SMITH: Objection. Scope.

12 THE WITNESS: I may have looked
13 years ago at the framework of a suspicious
14 order monitoring system on paper.

15 BY MS. MAINIGI:

16 Q. Do you have an understanding of what
17 would separate an acceptable compliance
18 suspicious order monitoring system from one
19 that was not compliant with regulations?

20 MS. SINGER: Objection. Vague.
21 Foundation. Scope.

22 MR. BENNETT: Join the scope
23 objection.

24 MR. UTTER: Go ahead.

25 THE WITNESS: Again, the suspicious